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March 29, 2021

**VIA ECF**

Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, NY 10007

**Re: *Relevant Sports, LLC v. United States Soccer Federation, Inc.*,  
No. 19-cv-08359-VEC**

Dear Judge Caproni:

This firm represents Plaintiff Relevant Sports, LLC (“Relevant”) in the above-captioned action. We write to respectfully submit for the Court’s consideration the Supreme Court’s recent decision in *Ford Motor Co. v. Montana Eighth Judicial District Court*, No. 19–368 (Mar. 25, 2021), attached hereto as **Exhibit A**. This supplemental authority is relevant to resolving Fédération Internationale de Football Association’s (“FIFA”) pending motion to dismiss Relevant’s amended complaint. ECF No. 68. Specifically, the *Ford Motor Co.* decision reinforces that this Court may constitutionally exercise specific personal jurisdiction over FIFA.

To satisfy due process for specific personal jurisdiction, a plaintiff’s claims must “arise out of or relate to” the defendant’s contacts with the forum state. Ex. A at 6; *accord* ECF No. 69 at 12. In *Ford Motor Co.*, an out-of-state defendant (Ford) that marketed its cars and licensed dealers in the forum state and caused injury to an in-state plaintiff argued that the plaintiff’s claim did not “arise out of or relate to” Ford’s in-state contacts because those contacts did not cause the plaintiff’s injuries. Ex. A at 8. The Supreme Court rejected this “causation-only approach,” holding that the “relate to” clause of the due process standard requires only “a ‘connection’ between a plaintiff’s suit and a defendant’s activities,” not a “causal showing.” *Id.*

Here, an out-of-state defendant (FIFA) that markets its games and licenses match agents in the forum state (New York) and caused injury to an in-state plaintiff (Relevant) argues that Relevant’s “claims do not ‘arise out of or relate to’” FIFA’s in-state contacts because those contacts are not “a proximate cause of [Relevant]’s injury.” ECF No. 69 at 14. *Ford Motor Co.* expressly forecloses this argument. Indeed, the decision makes clear that FIFA’s litany of contacts with New York (*see, e.g.*, ECF No. 77 at 22) are sufficiently connected with Relevant’s claims to provide this Court with specific personal jurisdiction over FIFA.

For these reasons, and the reasons set forth in Relevent's opposition brief, FIFA's motion to dismiss the amended complaint should be denied.

Relevent appreciates the Court's time and attention to this matter.

Respectfully submitted,

/s/ Jeffrey L. Kessler  
Jeffrey L. Kessler

cc: All Counsel of Record (via ECF)